

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

INTERNATIONAL FINANCE CORPORATION,
not in its individual capacity, but solely as the
Trustee for the IFC-Netherlands Carbon Facility,

Plaintiff,

v.

KORAT WASTE TO ENERGY CO. LTD.
(a/k/a Khorat Waste to Energy Co.),

Defendant.

07 Civ. 5451 (SHS)

**KWTE'S NOTICE OF MOTION FOR SUMMARY JUDGMENT
AS TO THE QUANTUM OF RELIANCE DAMAGES
RECOVERABLE UNDER COUNT I OF PLAINTIFF'S COMPLAINT**

PLEASE TAKE NOTICE that Defendant Korat Waste to Energy Co. Ltd. ("KWTE"), by and through its attorneys, Wallace King Domike & Reiskin, PLLC, and Morvillo, Abramowitz, Grand, Iason, Anello & Bohrer, P.C., will move this Court on a date and time to be determined at the Courthouse located at 500 Pearl Street, New York, New York 10007, for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting summary judgment in favor of KWTE as to the quantum of reliance damages potentially recoverable under Count I of Plaintiff International Finance Corporation's ("IFC's") Complaint.

Respectfully submitted,

April 10, 2008

/s/

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